

# EXHIBIT C

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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,  
 JEREMY DAVIS, CHRISTOPHER  
 CASTILLO, and MONIQUE TRUJILLO  
 individually and on behalf of all other  
 similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

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Case No.: 5:20-cv-03664-LHK-SVK

**[PROPOSED] ORDER REQUIRING  
 GOOGLE TO PRODUCE NON-PUBLIC  
 SOURCE CODE**

**[PROPOSED] ORDER**

Before the Court is Plaintiffs' request for an Order requiring Google to produce non-public source code. (Dispute P14). Having considered Plaintiffs' request, and good cause having been shown, the Court **GRANTS** Plaintiffs' request and **ORDERS** as follows:

By June 18, Google will produce non-public source code showing how:

1. Google internal and external facing applications, tools, and processes use browsing data to generate profiles on users and/or devices, including for Google's Ad Personalization service and including unauthenticated identifiers.
2. Google's Ad Personalization service targets advertisements to users and/or devices.
3. Google personalizes search results or Google news content for users and/or devices.

Google will produce the non-public source code at a location of Google's choosing.  
Google may supervise Plaintiffs' experts' access to this source code.

Google will also in advance provide Plaintiffs' attorneys and experts with documents sufficient to guide their inspection of the source code.

Production of non-public Google source code will be subject to the terms of the parties' Stipulated Protective Order (Dkt. No. 81).

This relief does not foreclose Plaintiffs from seeking access to additional aspects of non-public Google source code.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

Honorable Susan van Keulen  
United States Magistrate Judge